

# ALSTON & BIRD

90 Park Avenue  
New York, NY 10016  
212-210-9400 | Fax: 212-210-9444

Jenny Kramer

Direct Dial: 212-210-9420

Email: jenny.kramer@alston.com

March 31, 2025

## VIA ECF

Hon. John P. Cronan, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1320  
New York, NY 10007

Re: *United States v. Dalpour*, Case No. 1:24-cr-00264-JPC

Dear Judge Cronan,

We write on behalf of Idin Dalpour in the above-captioned matter to respectfully request that the Court enter an order modifying the conditions of Mr. Dalpour's pretrial release to allow him to travel to Pennsylvania for an upcoming family event. Specifically, Mr. Dalpour respectfully requests the Court's permission to travel with his family through New Jersey to Pennsylvania from April 4 to April 6, 2025 to attend his niece's bat mitzvah. While in Pennsylvania, he would stay at his brother-in-law's home in Merion Station, which as noted below is a destination to which the Court has previously granted Mr. Dalpour permission to travel.

As the Court will recall, Mr. Dalpour was released on May 1, 2024, on a \$500,000 personal recognizance bond, secured by property and co-signed by two financially responsible persons. His travel is restricted to the Southern and Eastern Districts of New York, and he under supervision by Pretrial Services. Since that time, with the consent of Pretrial Services and government counsel, Mr. Dalpour has requested certain modifications to his conditions of release to allow for travel with his family of a type similar to what he now requests: on May 9, 2024, the Court granted Mr. Dalpour's request to allow him to travel through New Jersey to Warwick, New York, where his family was moving out of a rental home, and to Fairfield, Connecticut from May 10 through May 13, 2024. Likewise, on November 15, 2024, the Court granted Mr. Dalpour's request to travel with his family to Merion Station, Pennsylvania for the Thanksgiving holiday from November 19 to December 1, 2024. Most recently, on December 19, 2024, the Court granted Mr. Dalpour's request to travel through Connecticut to Massachusetts to stay with his family from December 23 to December 27, 2024.

Mr. Dalpour is understood to be in full compliance with his conditions of release, and at the conclusion of his prior travels he has reliably returned to his home in New York, just as he would be expected to do on April 6. We have conferred with government counsel and Pretrial Services regarding this request, and both have consented to it.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Jenny Kramer

Jenny Kramer  
ALSTON & BIRD LLP  
90 Park Avenue  
New York, NY 10016  
(212) 210-9420  
Jenny.Kramer@alston.com

The request is granted. Mr. Dalpour's bail conditions are modified to allow him to travel through New Jersey to Pennsylvania from April 4, 2025 to April 6, 2025. Mr. Dalpour must provide Pretrial Services with a detailed itinerary prior to that travel.

SO ORDERED

April 1, 2025

New York, New York



JOHN P. CRONAN  
United States District Judge